

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERK'S OFFICE

2005 Mar 16 P 2:28

NO. 04-30019-MAP

U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA)
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V.)
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)
ROBERT KNOWLES,)

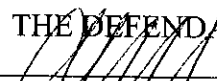
MOTION FOR CRIMINAL RECORDS

Now comes the defendant in the above-entitled matter and respectfully moves that this Honorable Court order the United States Probation Department or the United States Attorney's Office to furnish the Defendant's counsel with criminal and juvenile records of the following witness on the Government's witness list.

1. Raymond Frazier
DOB 12/30/1982

The above-described record is evidence affecting the credibility of a key Government witness and is therefore, exculpatory evidence under Giglio v. United States, 405 U.S. 150 (1972).

Respectfully submitted,

By: ~~THE DEFENDANT~~

ALAN JAY BLACK, His Attorney
1383 Main Street
Springfield, Massachusetts 01103
(413) 732-5381
BBO 553768

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

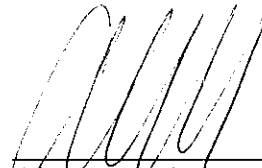
V.

ROBERT KNOWLES

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) **CRIMINAL NO. 04-30019-MAP**
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CERTIFICATE OF SERVICE

I, ALAN J. BLACK, attorney for the DEFENDANT, hereby certify that I have served a copy of the attached Supplemental Memo in Support of Defendant's Motion to Suppress Statement and Motion for Criminal Records by serving in hand on this 16th day of March 2005, to Assistant United States Attorney Paul Smyth, 1500 Main Street, Springfield, MA 01103.



Alan J. Black, Esq.